

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

PLAINTIFF'S PROPOSED *VOIR DIRE* QUESTIONS

Matthew D. Vella (BBO #660171)
Adam R. Doherty (BBO #669499)
Kevin Gannon (BBO #640931)
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ATTORNEYS FOR THE PLAINTIFF

Plaintiff, Singular Computing LLC (“Singular”), respectfully submits the following *voir dire* questions in this case. Singular requests that it be permitted to submit further proposed questions should any juror response(s) to the following questions indicate that follow-up questioning is warranted.

1. Have you, or anyone close to you such as a friend or family member, ever worked at or for any of the following companies:
 - a) plaintiff, Singular Computing LLC of Cambridge, Massachusetts;
 - b) defendant, Google LLC of Mountain View, California;
 - c) defendant Google’s parent company, Alphabet Inc. of Mountain View, California
2. Have you, or anyone close to you such as a family member or friend, ever had any business or other financial dealings with any of the following companies:
 - a) Singular Computing;
 - b) Google;
 - c) Alphabet Inc.
3. Have you, or anyone close to you such as a family member or friend, ever owned any stock in any of the following companies:
 - a) Singular Computing;
 - b) Google;
 - c) Alphabet Inc.
4. Have you, or anyone close to you such as a family member or friend, ever had any other experience whether good or bad with any of the following companies:
 - a) Singular Computing;
 - b) Google;
 - c) Alphabet Inc.
5. Do you have any strong opinions about companies obtaining patents that would make it difficult for you to be a fair juror?

6. Do you have any strong opinions about companies bringing suit for patent infringement that would make it difficult for you to be a fair juror?
7. Do you have any strong opinions about the United States Patent and Trademark Office that would make it difficult for you to be a fair juror?
8. Have you, or anyone close to you such as a family member or friend, ever applied as an inventor for a patent in the United States or elsewhere?
9. Have you, or anyone close to you such as a family member or friend, or your employer ever been accused of infringing a patent?
10. Have you, or anyone close to you such as a family member or friend, or your employer ever accused anyone else of infringing a patent?
11. Have you, or anyone close to you such as a family member or friend, ever had any business dealings with Google LLC or Alphabet Inc.
12. Have you read or heard anything about this lawsuit?

If so, what have you read or heard?

13. Have you, or anyone close to you such as a family member or friend, ever been represented by any of the following law firms:

Sunstein LLP
Prince Lobel Tye LLP
Wolf, Greenfield & Sacks, P. C.
Keker, Van Nest & Peters LLP
Kwun Bhasali Lazarus LLP
Paul Hastings LLP
Munger, Tolles & Olson LLP

14. Have you heard anything about any of the following law firms:

Sunstein LLP
Prince Lobel Tye LLP
Wolf, Greenfield & Sacks, P. C.
Keker, Van Nest & Peters LLP
Kwun Bhasali Lazarus LLP
Paul Hastings LLP
Munger, Tolles & Olson LLP

15. The following are the attorneys in this case. Please raise your hand if you know any of them:

For Singular:

Kerry L. Timbers
Matthew D. Vella
Adam R. Doherty
Brian Seeve
Kevin Gannon
Daniel McGonagle
Robert Gilman
Aaron S. Jacobs
Jeffrey Jackson Pyle

For Google:

Gregory F. Corbett
Nathan R. Speed
Elizabeth A. DiMarco
Anant K. Saraswat
Robert Van Nest
Michelee Ybarra
Andrew Bruns
Vishesh Narayen
Christopher S. Sun
Anna Porto
Deeva Shah
Stephanie J. Goldberg
Eugen M. Paige
Michael S. Kwun
Asim M. Bhansali
Matthias A. Kamber
Ginger D. Anders
J. Kain Day
Kevin Li
Spencer McManus
Erik K. Phung
Jay Rappaport
Deeva Shah
Michelle Ybarra

16. The following persons may testify as witnesses in this case. Please raise your hand if you know any of them:

Joseph Bates
Sunil Khatri
Philip J. Isaak
Philip Green
Jeff Dean
John Gustafson
Norm Jouppi
Andrew Phelps
Astro Teller
Andre Ng
Nishant Patil
Kamran Shafei
Tammo Spalink
Obi Felten
Catherine Tornabene
Andrew Swing
Naveen Kumar
James Laudon
Miriam Leeser
Matthew Mabey
James Maccoun
KC Mares
David Patterson
Laura Stamm
Marty Walker
Stephen Boyd
Michael Holzrichter
Mustafa Ozgen

December 29, 2023

Respectfully submitted,

/s/ Kevin Gannon

Matthew D. Vella (BBO #660171)

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CERTIFICATE OF SERVICE

I certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ Kevin Gannon